

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

YEKATERINA YUROCHKINA,
a/k/a "Katya Yuro,"

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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x
: INDICTMENT

: 10 Cr.

:

COUNT ONE

The Grand Jury charges:

1. From at least in or about October 2008, up to and including in or about September 2009, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, violations of Title 18, United States Code, Section 1546(a).

2. It was a part and an object of the conspiracy that YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, and others known and unknown, unlawfully, willfully, and knowingly, would and did make under oath, and as permitted under penalty of perjury under section 1746 of Title 28, United States Code, and would and did subscribe as true, false statements with respect to material facts in applications, affidavits, and other documents required by the immigration laws and regulations prescribed thereunder, and would and did present such applications, affidavits, and other documents which did contain such false statements and which did fail to contain any reasonable basis in

George Hellerstein

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law or fact, in violation of Title 18, United States Code, Section 1546(a).

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 5, 2008, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, signed an application for permanent resident status.

b. In or about October 2008, YUROCHKINA submitted to United States immigration authorities the application dated October 5, 2008 described in subparagraph (a) above.

c. On or about October 14, 2008, YUROCHKINA signed an application for permanent resident status.

d. In or about October 2008, YUROCHKINA submitted to United States immigration authorities the application dated October 14, 2008 described in subparagraph (c) above.

e. On or about May 12, 2009, YUROCHKINA signed an application for permanent resident status.

f. In or about May 2009, YUROCHKINA submitted to United States immigration authorities the application dated May 12, 2009 described in subparagraph (e) above.

g. On or about August 25, 2009, YUROCHKINA signed an application for permanent resident status.

h. In or about August 2009, YUROCHKINA submitted to United States immigration authorities the application dated August 25, 2009 described in subparagraph (g) above.

i. On or about August 31, 2009, YUROCHKINA signed an application for permanent resident status.

j. In or about August 2009, YUROCHKINA submitted to United States immigration authorities the application dated August 31, 2009 described in subparagraph (i) above.

k. On or about September 27, 2009, YUROCHKINA signed an application for permanent resident status.

l. In or about September 2009, YUROCHKINA submitted to United States immigration authorities the application dated September 27, 2009 described in subparagraph (k) above.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. In or about October 2008, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, unlawfully, willfully and knowingly did make under oath, and under penalty of perjury under Title 28, United States Code, Section 1746, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which did contain such false statement and which did fail to contain any reasonable basis in law or fact, to wit, YUROCHKINA submitted to United States immigration authorities an application for

permanent resident status dated October 5, 2008 which contained materially false statements.

(Title 18, United States Code, Section 1546(a) and 2.)

COUNT THREE

The Grand Jury further charges:

5. In or about October 2008, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, unlawfully, willfully and knowingly did make under oath, and under penalty of perjury under Title 28, United States Code, Section 1746, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which did contain such false statement and which did fail to contain any reasonable basis in law or fact, to wit, YUROCHKINA submitted to United States immigration authorities an application for permanent resident status dated October 14, 2008 which contained materially false statements.

(Title 18, United States Code, Section 1546(a) and 2.)

COUNT FOUR

The Grand Jury further charges:

6. In or about May 2009, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, unlawfully, willfully and knowingly did

make under oath, and under penalty of perjury under Title 28, United States Code, Section 1746, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which did contain such false statement and which did fail to contain any reasonable basis in law or fact, to wit, YUROCHKINA submitted to United States immigration authorities an application for permanent resident status dated May 12, 2009 which contained materially false statements.

(Title 18, United States Code, Section 1546(a) and 2.)

COUNT FIVE

The Grand Jury further charges:

7. In or about August 2009, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, unlawfully, willfully and knowingly did make under oath, and under penalty of perjury under Title 28, United States Code, Section 1746, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which did contain such false statement and which did fail to contain any reasonable basis in law or fact, to wit, YUROCHKINA submitted to United States immigration authorities an application for

permanent resident status dated August 25, 2009 which contained materially false statements.

(Title 18, United States Code, Section 1546(a) and 2.)

COUNT SIX

The Grand Jury further charges:

8. In or about August 2009, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, unlawfully, willfully and knowingly did make under oath, and under penalty of perjury under Title 28, United States Code, Section 1746, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which did contain such false statement and which did fail to contain any reasonable basis in law or fact, to wit, YUROCHKINA submitted to United States immigration authorities an application for permanent resident status dated August 31, 2009 which contained materially false statements.

(Title 18, United States Code, Section 1546(a) and 2.)

COUNT SEVEN

The Grand Jury further charges:

9. In or about September 2009, in the Southern District of New York and elsewhere, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, unlawfully, willfully and knowingly

did make under oath, and under penalty of perjury under Title 28, United States Code, Section 1746, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which did contain such false statement and which did fail to contain any reasonable basis in law or fact, to wit, YUROCHKINA submitted to United States immigration authorities an application for permanent resident status dated September 27, 2009 which contained materially false statements.

(Title 18, United States Code, Section 1546(a) and 2.)

FORFEITURE ALLEGATION

10. As a result of committing the conspiracy to violate Title 18, United States Code, Section 1546(a), in violation of Title 18, United States Code, Section 371, charged in Count One of this Indictment, and as a result of committing the offenses charged in Counts Two, Three, Four, Five, Six, and Seven of this Indictment, in violation of Title 18, United States Code, Sections 1546(a) and 2, YEKATERINA YUROCHKINA, a/k/a "Katya Yuro," the defendant, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(6), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offenses of which the defendant is convicted; and any property real or personal that constitutes, or is derived from or is traceable to proceeds obtained directly or indirectly from the

commission of the offense of which the defendant is convicted; or that is used to facilitate, or is intended to be used to facilitate, the commission of the offenses of which the defendant is convicted.

Substitute Asset Provision


11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 371, 982 and 1546(a); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT

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(18 U.S.C. §§ 2, 371, and 1546(a))

PREET BHARARA
United States Attorney.

A TRUE BILL

Foreperson.

Charles Thomas

6-18-10

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Filed Indictment. Case assigned to J. Hellerstein.

Mays
U.S.M.J.